

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN
GREEN BAY DIVISION

SHELLEY BASTIAN

Plaintiff,

v.

Case No. 22-cv-886

ABRAMS GAS, INC., *et. al.*

Defendants

DECLARATION OF SHELLEY BASTIAN

I, Shelley Bastian, declare under penalty of perjury that the following is true and correct to the best of my knowledge and recollection:

1. The statements set forth in this declaration are made of my own personal knowledge and, if called as a witness, I could and would testify competently to the matters stated below.
2. I am an adult resident of the State of Wisconsin, and I live at 5111 Ballpark Road, Little Suamico, Wisconsin 54141.
3. In approximately the year 2002, I began my employment at Abrams Gas and Velp Gas as a full-time Store Manager.
4. During my employment at Abrams Gas and Velp Gas, Sarbjit Singh was the owner, operator, and manager of Abrams Gas and Velp Gas, and he was my direct supervisor. Mr. Singh supervised my day-to-day activities, reviewed my work performance, established the workplace policies and procedures, established my work schedule, provided me with work assignments, and was the individual who hired me.

5. Throughout my employment at Abrams Gas and Velp Gas, I was paid an hourly rate of pay. During the three years immediately preceding the filing of this case, my average hourly rate of pay was approximately \$16.00 per hour.

6. During the three years immediately preceding the filing of this case, I routinely worked in excess of forty (40) hours per workweek.

7. During my employment at Abrams Gas and Velp Gas, I routinely and customarily performed approximately thirty (30) minutes of work each workday prior to the start of my scheduled shift. The pre-shift work that I performed each workday included opening the safe, counting money, tallying receipts, starting orders, performing inventory, and communicating with co-workers regarding work-related assignments and tasks. Although this work was done with Mr. Singh's knowledge and at Mr. Singh's direction, I was not paid for the time spent performing this pre-shift work each workday.

8. During my employment at Abrams Gas and Velp Gas, I routinely and customarily performed approximately forty-five (45) minutes of work each workday after the conclusion of my scheduled shift. The post-shift work that I performed each workday included cleaning the store, re-stocking shelves, re-filling inventory, and taking out and emptying the garbage. Although this work was done with Mr. Singh's knowledge and at Mr. Singh's direction, I was not paid for the time spent performing this post-shift work each workday.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 22nd day of December, 2022

s/ Shelley Bastian
Shelley Bastian